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July 23, 2025

BY ECF

Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Granted.

SO ORDERED:

7/24/2025

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Re: Taylor v. Rengel et al.
23 Civ. 10324 (JHR) (RWL)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Muriel Goode-Trufant, Corporation Counsel of the City of New York, and attorney representing Officers Rengel and Ortiz (City Defendants) in the above-referenced matter. I write to respectfully request that the Court extend the summary judgment deadline from July 25, 2025 to August 15, 2025. This is the first request of its kind. Counsel for Co-Defendant Kirk Robinson consents to this request. Consent from Plaintiff could not be readily obtained.¹

By way of background, Plaintiff initiated this action pursuant to 42 U.S.C. § 1983 on November 21, 2023 against, *inter alia*, claims of false arrest, illegal search and excessive force. (ECF No. 1, at 4.) Plaintiff alleges for the two instances of excessive force occurred where: (1) Plaintiff's wrists were tightly handcuffed as a result of his arrest and (2) Plaintiff was dragged out by his legs out a police vehicle where he landed on his back and head. (*Id.*) Discovery ended on June 26, 2025 after a limited extension granted by the Court. (ECF No. 56) Under the Federal Rules of Civil Procedure the deadline for City Defendants to file their summary judgment motion is July 25, 2025. F. R. Civ. P. 56(b).

Counsel has been writing a reply in another matter that is due on Friday and unfortunately this summary judgment motion escaped the undersigned's attention. While unfortunate, an extension of time is requested so the defendants are not prejudiced by a hastily-written motion. In addition, this request, of three weeks will cause little prejudice to plaintiff. Defendants also have another summary judgment motion due in another matter in two weeks which is why the three week extension is necessary. This extension will not affect any other deadlines before the Court.

¹ The undersigned left an email for Plaintiff yesterday and have not heard back him.

Accordingly, the parties respectfully requests that the Court extend the summary judgment deadline from July 25, 2025 to August 15, 2025.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Seamus O'Connor

Seamus O'Connor
Assistant Corporation Counsel
Special Federal Litigation Division

CC: VIA US Mail
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